

DOCKET FILE COPY ORIGINAL

# PAUL REYNOLDS CONSULTANT

December 17, 1993

415 North College Street  
Greenville, AL 36037  
(205) 382-8048 Fax 382-2940

RECEIVED

DEC 20 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William A. Caton, Secretary  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

RE: Counterproposal & Comments, MM Docket 93-270

Dear Mr. Caton:

Enclosed please find the Counterproposal & Comments of Dawson Broadcasting Company in the above captioned Docket. The file date for these Comments is December 20, 1993. Therefore, they are timely filed.

Please have someone in your office forward the Counterproposal and Comments to:

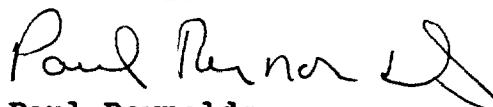
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

Additionally, there is an attached copy labeled "Receipt Stamp Copy." Please have someone receipt stamp these and return them in the attached addressed envelope for the Petitioners records.

The Commission's records list one of the Receivers for Dawson Broadcasting Company as John F. Tuck. This is in error. Please make this letter a part of the proceeding and correct this to Jack F. Tuck.

Thank you for your assistance in getting these Comments filed.

Sincerely,



Paul Reynolds,  
Consultant

Enclosure(s)

No. of Copies rec'd 024  
List A B C D E

**BROADCAST CONSULTING AND CONSTRUCTION**

**ORIGINAL**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

DOCKET FILE COPY ORIGINAL

In The Matter of )

Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
(Cordele, Dawson, )  
Montezuma, & Leary, Georgia) )

MM Docket 93-270

RM-8323

RM-8339

To:

Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**RECEIVED**

**DEC 20 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COUNTERPROPOSAL. COMMENTS**

**AND EXPRESSION OF INTEREST**

**HISTORY**

In the above captioned Docket, the Commission is considering two inter-related petitions for rule making. The first petition filed by Radio Cordele, Inc. ("RCI"), licensee of WKKN, Channel 252A, Cordele, Georgia, proposes to substitute Channel 236A for Channel 252A and modify its license to specify the new class A channel. The allocation of Channel 236A for Channel 252A requires that Channel 290A be substituted for Channel 236A at Montezuma, Georgia. The second petition the Commission is considering in the present Notice of Proposed Rule Making and Order to Show Cause (NPRM) is a request by Jack Tuck and Phonso Donaldson, Bankruptcy Court Appointed Receivers for Dawson Broadcasting

Company (DBC), licensee of Station WAZE(FM), Dawson, Georgia. DBC is seeking the deletion of the recently allocated Channel 251A at Dawson and the substitution of Channel 251C3. In order for Channel 251C3 to be substituted for Channel 251A at Dawson, Channel 236A must be substituted for Channel 252A at Cordele. Channel 236A at Cordele can only be allocated if a substitute channel is allocated for Channel 236A at Montezuma.

In the NPRM released November 28, 1993 (DA 93-1195), the Commission, in paragraph 5, takes exception to the RCI and DBC argument that the permittee at Montezuma is not in a position to receive reimbursement for the modifications in a channel change. However, the Commission states, "Whenever an existing licensee or permittee is Ordered to change frequencies to accommodate a new channel allotment, Commission policy requires the benefitting party or parties, to reimburse the affected station for cost incurred." Paragraph 5 further states that if Macon County Broadcasting Company ("Macon County"), the permittee of Station WLML(FM) at Montezuma, Georgia, can establish cost that directly concern the frequency change, it can claim reimbursement. DBC and RCI were therefore requested to state their intentions to reimburse Macon County for reasonable costs incurred as a result of changing frequencies.

The NPRM of MM Docket 93-270 was adopted on September 30, 1993. Subsequent to the adoption of this NPRM, the Commission issued a letter to Macon County dated October 15,

1993, pertaining to the Macon County application for extension of time to construct the facilities of unbuilt station WLML(FM), Montezuma (Reply Reference No. 1800B3-DJS). In the letter Macon County was notified in the last paragraph, "In light of the above, and pursuant to 47 C.F.R. Section 0.283, IS ORDERED, that the application for an extension of time to construct filed by Macon County Broadcasting Company IS DENIED. (BPH-930630JD). IT IS FURTHER ORDERED, that the WLML(FM) construction permit (BPH-871123MC) IS HEREBY FORFEITED AND CANCELLED. The call letters WLML(FM) ARE HEREBY DELETED." A copy of the Commission's letter to Macon County is attached as Exhibit A. DBC is unsure at this time about claims an applicant, permittee, or licensee at Montezuma may have. However, DBC makes an unequivocal statement as to its willingness to reimburse such party at Montezuma, if the Commission so dictates. This statement is made in detail later in this document.

#### NATURE OF THE COUNTERPROPOSAL

DBC, by means of this document, hereby files its counterproposal in the NPRM. The counterproposal is offered in three options. Options I and II involve request for a change in the city of license for WAZE(FM), whereas Option III basically a reiteration and and/or expression of continuing interest in the original DBC PRM.

## OPTION I

In this option, DBC proposes that Channel 251A be deleted at Dawson and Channel 251C3 be substituted at Leary, Georgia. Leary is an incorporated community in Calhoun County. The 1990 census reports that Leary has a population of 783 persons. The community of Leary has all of the necessary indicia to justify it as being a community of license. Dawson will not be left without service as co-owned WHIA(AM) will continue to serve the Dawson area. It should be noted that both stations are currently "dark" under Special Temporary Authorization (STA) from the Commission. The DBC STA is current and WHIA will be returned to the air prior to any Commission action on this counterproposal. In previous rule makings the Commission has held that a community is considered to have service if the station is operational when the docket is "ripe for decision." WHIA will be operating and DBC will offer the Allocations Branch verification by means of a supplement.

Option I also calls for the deletion of Channel 252A at Cordele and the substitution of Channel 236A for WKKN. This substitution at Cordele also requires the substitution of another channel for Montezuma. At present it appears that the best substitution at Montezuma is Channel 290A.

## OPTION II

Option II of the DBC counterproposal also proposes that Channel 251A at Dawson be deleted and Channel 251C3 be

allocated at Leary. However, allocation of Channel 251C3 at Leary in this option does not require the deletion of Channel 252A at Cordele. As shown in the attached engineering statement of Paul Reynolds, Channel 251C3 can be allocated at Leary in keeping with the Commission's minimum distance separation requirements if a site restriction is used. This allocation is made possible due to the voluntary downgrading of WQHL(FM), Live Oak, Florida. WQHL presently operates as a class C2 on Channel 251. The WQHL licensee had previously received permission to upgrade to Channel 251C1. However, they chose not to exercise that option. As the attached engineering statement illustrates, an allocations window in the spectrum will allow for a class C3 at Leary on Channel 251C3.

Options I and II allow for the creation of a first local at Leary, while not depriving Dawson of its only local service. Additionally both options request that the license of WAZE be modified accordingly.

#### **OPTION III**

Option III is identical to the original petition for rule making submitted by DBC. It requests that Channel 251A be deleted at Dawson and Channel 251C3 be substituted. In order for this substitution to occur, Channel 236A will be substituted for Channel 252A at Cordele. This also will require a modification of the license of WKKN to reflect this change.

The previous options are listed in the order of the DBC preference. DBC requests that the Commission consider Option II only if Option I is not available due to some other consideration that the Commission could be giving to other rule makings. Additionally, Option III should be considered only if Options I and II cannot be allocated. It should be noted that the original PRM filed by DBC and RCI request the substitution of Channel 290A for Channel 236A at Montezuma. However, as demonstrated in the attached engineering statement, Channel 221A could also be used for allocation at Montezuma. Presently there is one applicant for the Montezuma allocation under a "First Come/First Serve" basis. The applicant is Radio Cordele, Inc., the same party that is the licensee of WKKN, Cordele and the petitioner of the inter-related PRM in this docket. While it will take a different set of coordinates for the allocation of Channel 221A from those of the RCI application site, RCI, in comments being filed simultaneously with this document agrees to modify its application to accept those coordinates.

## COUNTERPROPOSAL SUMMARIZED

The DBC counterproposal can be summarized in tabular form as follows:

### **Option I:**

<u>City</u>	<u>Present</u>	<u>Proposed</u>	DBC <u>Counterproposal</u>
Dawson	251A WHIA (AM)	251C3 WHIA (AM)	WHIA (AM)
Leary	----	----	251C3
Cordele	252A	236A	236A
Montezuma	236A	290A	290A or 221A

### **Option II:**

<u>City</u>	<u>Present</u>	<u>Proposed</u>	DBC <u>Counterproposal</u>
Dawson	251A WHIA (AM)	251C3 WHIA (AM)	WHIA (AM)
Leary	----	----	251C3
Cordele	252A	236A	252A
Montezuma	236A	290A	290A, 221A or 236A

### **Option III:**

<u>City</u>	<u>Present</u>	<u>Proposed</u>	DBC <u>Counterproposal</u>
Dawson	251A WHIA (AM)	251C3 WHIA (AM)	251C3 WHIA (AM)
Cordele	252A	236A	236A
Montezuma	236A	290A	290A or 221A



### EXPRESSION OF INTEREST

DBC continues to be extremely interested in upgrading the facilities of WAZE(FM), Dawson, Georgia. Its interest lies along the lines of those expressed in this counterproposal. DBC states that if the Commission acts favorably on its Counterproposal, Options I, II, or III, it will timely file an application for construction permit and, upon its grant, will promptly construct and operate a new class C3 service to either Leary or Dawson.

### REIMBURSEMENT OF EXPENSES

It is somewhat unclear to DBC as to whom reimbursement expenses would be payable at Montezuma, since the former permittee is no longer an authorized permit holder. Furthermore, the only applicant at Montezuma is also requesting that the channel be substituted. However, DBC would like to officially state that if the Commission requires any party at Montezuma be reimbursed, it will participate with RCI in reimbursing all reasonable costs related to a channel change. If, for some reason, RCI is not a participator in a scenario that brings about the WAZE upgrade, RCI will reimburse all of the reasonable expenses related to a channel change in Montezuma.

## CONCLUSION

Dawson Broadcasting Company, licensee of WHIA(AM) and WAZE(FM) at Dawson, Georgia, hereby offers a counterproposal in MM Docket 93-270. The Commission asked for comments two options, one of which only included Cordele and Montezuma, Georgia, and the other included those cities plus Dawson. The instant counterproposal is complementary to both options offered by the Commission. The DBC Option I allows for the creation of a new first local service at Leary, Georgia, while maintaining local service at Dawson through co-owned WHIA(AM). This option requests the deletion of Channel 252A at Cordele and the substitution of Channel 236A. This substitution also requires the substitution of Channel 290A or Channel 221A at Montezuma. It should be noted that in simultaneous Comments being filed by RCI, it is noted that if Channel 236A is substituted for Channel 252A at Cordele, WKKN can take advantage of the Commission's new "One Step Upgrade by Application" Rule and optimize its facility by becoming Channel 236C3. Therefore, the DBC Counterproposal, Option I, allows for two upgrades and the continued first local service at Dawson (WHIA) and Montezuma (CH290A or CH221A).

DBC requests that the Commission consider Option II of the Counterproposal only if, for any reason, Channel 236A cannot be substituted for Channel 252A at Cordele. Likewise, Option III should be considered only if Options I

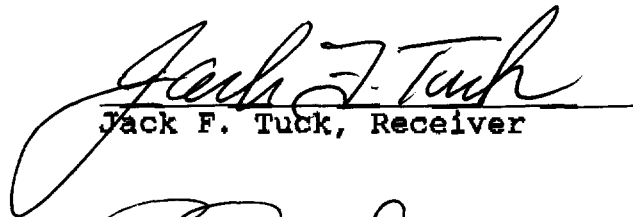
and II are not available and if Channel 290A is not available for substitution at Montezuma.

Therefore, DBC respectfully requests that the Commission accept and adopt the present counterproposal which, in time, will create two class C3 stations.

### CERTIFICATION

We, Jack F. Tuck and Phonso Donaldson, Court Appointed Receivers for Dawson Broadcasting Company, Petitioners for an upgrade of WAZE(FM), Dawson, Georgia, do hereby verify that the statements contained in this Counterproposal (for MM Docket 93-270) are true and correct to the best of our knowledge and belief. We represent that this Counterproposal is not filed for the purpose of impending, obstructing, or delaying determination on any other application or petition with which it may be in conflict.

Respectfully Submitted,  
DAWSON BROADCASTING COMPANY

  
Jack F. Tuck, Receiver

  
Phonso Donaldson, Receiver

This 17th Day of December, 1993

Dawson Broadcasting Company  
c/o Truitt Martin, Jr. Esq.  
P.O. Box 683  
Dawson, Georgia 31742

# **ENGINEERING STATEMENT**

In Support of a

## **COUNTERPROPOSAL MM DOCKET 93-270, RM-8323, RM-8339**

**DAWSON BROADCASTING COMPANY**

### **HISTORY**

The instant engineering statement is submitted in support of a counterproposal being filed by Dawson Broadcasting Company (DBC) in the above captioned proceeding. Initially in this Docket DBC had petitioned the Commission to allocate channel 251C3 to Dawson by deleting the newly assigned Channel 251A (for use by DBC's WAZE) and substituting Channel 236A for Channel 252A at Cordele. This substitution, in turn, required that Channel 290A be substituted for Channel 236A at Montezuma. The instant counterproposal still considers the original petition as one of its options. However, changes by other stations in previous rule makings have allowed for more options in the upgrade of WAZE.

### **NATURE OF THE COUNTERPROPOSAL**

DBC is modifying its original petition through the instant counterproposal. In the original petition, DBC noted that the voluntary downgrade of WQHL opened spacing for the allocation of a class C3 channel in the Dawson area. However, in order for channel 251C3 to be allocated to Dawson it also required the deletion of channel 252A at

Cordele. As shown in the attached exhibits, channel 251A can be deleted at Dawson and channel 251C3 allocated to Leary, Georgia, even if channel 252A remains at Cordele.

DBC still very strongly supports the premise that channel 236A should be substituted for channel 252A at Cordele. This substitution at Cordele allows for a much larger channel 251C3 antenna location area and a possible future upgrade to a class C2.

WAZE(FM) and WHIA-AM are both silent under the authority of an STA. The allocation of channel 251A at Dawson requires a antenna/tower relocation on the part of WAZE. DBC is waiting for the outcome of the instant rule making before filing a Form 301 for a new antenna site on channel 251. However, WHIA will be returned to the air before a final decision on the DBC Counterproposal.

Option I of the DBC Counterproposal requests the following:

- 1). Channel 251A be deleted at Dawson and channel 251C3 be allocated to Leary, Georgia, as that community's first local service.

- 2). In order to use the reference coordinates that DBC desires, and to maximize the allocation, channel 236A must be substituted for channel 252A at Cordele and the license of WKKN(FM) modified accordingly.

- 3). Channel 236A can only be substituted for channel 252A at Cordele when a substitute channel is allocated for channel 236A at Montezuma, Georgia.

4). Radio Cordele, Inc. (RCI) and DBC, in their original petitions for rule making, offered Channel 290A as a substitute for Channel 236A at Montezuma. However, since the original petitions were filed, the CP of Macon County Broadcasting Company ("MCB") has been cancelled, forfeited, and the call letters deleted. Subsequent to this action by the Commission on October 15, 1993, a "First Come/First Serve" application has been filed by another party. The applicant is RCI. The application coordinates are different than those proposed for WLML. In its Form 301 application, RCI included two allocation studies demonstrating that both channel 236A and 290A met the Commission's minimum distance separation requirements at the RCI application site. In the instant counterproposal, DBC is offering another choice for the channel substitution at Montezuma. This channel should be considered by the Commission only if Channel 290A is not available for substitution.

Channel 221A was deleted at Dawson in MM Docket 90-475. MM Docket 87-480 also deleted Channel 221A at Eastman, Georgia. With the deletion of these two channels and a site change at Montezuma, this channel can be offered as a substitute for Channel 236A. New Commission Rules require proposed rule makings offer separation protection to pending applications. However, in documents being filed by RCI simultaneously with the filing of the instant counterproposal, RCI states that it is agreeable to a site change for its pending application at Montezuma. Again it

should be noted that both DBC and RCI want Commission consideration of Channel 221A at Montezuma only if Channel 290A is not available for substitution.

Option II of the DBC Counterproposal requests the following:

- 1). Delete Channel 251A at Dawson and substitute Channel 251C3 at Leary, Georgia. A set of coordinates is offered for this allocation that meets all existing channel separation requirements.

- 2). This option should only be considered by the Commission if Channel 236A cannot be substituted for Channel 252A at Cordele.

Option III of the DBC Counterproposal requests the following:

- 1). The same basic scenario as the original DBC petition for rule making.

- 2). The only exception is the possible use of Channel 221A for Channel 236A at Montezuma.

#### EXHIBITS EXPLAINED

Exhibit E, Figure 1 is an allocations study depicting that Channel 251C3 can be allocated to Leary when Channel 251A at Dawson and Channel 252A at Cordele are both deleted.

Exhibit E, Figure 2 is a computer generated separations contour chart for Channel 251C3 at Leary. It depicts a sizeable allocations window for prospective tower sites once



Channel 252A at Cordele and Channel 251A at Dawson are deleted.

Exhibit E, Figure 3 is a portion of a State of Georgia USGS 1:500,000 scale topographic map with the DBC Option I antenna site plotted and the 70 dBu contour drawn in. This is an actual 70 dBu contour with a maximum class C3 facility (25 kw at 100 m HAAT). This exhibit also factors in terrain deviations. Therefore, it demonstrates that the DBC study coordinates can be used and provide the required primary community contour (city-grade) to Leary.

Exhibit E, Figure 4 is an allocations study showing that Channel 251C3 can be allocated to Leary with coordinates that give all existing stations and channels the required separations.

Exhibit E, Figure 5 is a computer generated separations contour chart depicting an allocations window for Channel 251C3 at Leary according to the scenario developed in the DBC Counterproposal Option II. Although these coordinates provide for the allocation of Channel 251C3 at Leary, they are much less desirable than those offered in the DBC Option I, since the site restriction makes it necessary for a location away from population centers.

Exhibit E, Figure 6 is a portion of a State of Georgia USGS 1:500,000 scale topographic map with the DBC Option II antenna site plotted and the 70 dBu contour drawn in. This is an actual 70 dBu contour with a maximum class C3 facility (25 kw at 100 m HAAT). The exhibit also factors in terrain

deviations. Therefore, this exhibit demonstrates that Channel 251C3 can be allocated at the Option II site and provide the provide the principal community service contour.

Exhibit E, Figure 7 is an allocations study demonstrating that Channel 221A can be substituted for Channel 236A at Montezuma if a site restriction is used. The coordinates previously used by MCB and those presently used in the application of RCI are short-spaced for the use of Channel 221A at Montezuma. However, RCI, the only applicant for Channel 236A at Montezuma, has agreed to accept another site by modifying its pending application. This action should only be considered by the Commission if Channel 290A is not available for substitution at Montezuma.

Exhibit E, Figure 8 is a computer generated separations contour chart demonstrating an allocations window exists for tower sites when Channel 221A is considered at Montezuma.

Exhibit E, Figure 9 is a portion of a State of Georgia 1:500,000 scale USGS topographic map with the DBC Options I and III allocations coordinates of Channel 221A at Montezuma plotted. The principal community contour is also drawn. This exhibit demonstrates that Channel 221A can be allocated to Montezuma and provide the required 70 dBu contour service.

Exhibit E, Figure 10 is a copy of the allocations study used in the RCI application at Montezuma. This study demonstrates that Channel 290A can be substituted for

Channel 236A at the RCI application site without any modification of its existing application.

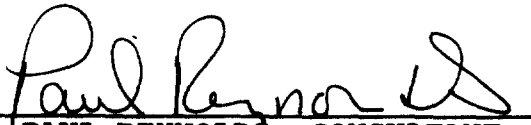
### CONCLUSION

The instant engineering statement has demonstrated that Option I of the DBC Counterproposal is preferable over the other options. However, if counterproposals or scenarios offered by other parties create situations where Channel 236A cannot be substituted for Channel 252A at Cordele, DBC requests that the Commission allocate Channel 251C3 to Leary under its Option II. Finally, if scenarios are introduced that prohibit the allocation of Channel 290A as a substitute for Channel 236A at Montezuma, DBC requests that the Commission allocate Channel 221A. This channel is a viable option, since the only applicant for a new service at Montezuma, RCI, has agreed to modify its application to a site that allows operation on Channel 221A.

## **CERTIFICATION**

I, Paul Reynolds, hereby certify the following: that I am an independent broadcast consultant; that I hold a Bachelor of Science degree in Communications from the University of Southern Mississippi and have completed work for a Masters Degree in Communications from the University of Alabama; I have been a practicing consultant since 1980, and I am familiar with the Commission's rules and regulations; I have filed numerous petitions and applications in association with Amerimedia, Inc., and my qualifications are known in the industry and at the Commission; I have been retained by Jack F. Tuck and Phonso Donaldson, Court Appointed Receivers for Dawson Broadcasting Company, to prepare this Engineering Statement in support of a "Counterproposal and Comments" in MM Docket 93-270.

All information in this engineering statement was prepared by me or under my direct supervision. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Signed   
PAUL REYNOLDS, CONSULTANT

THIS 17<sup>th</sup> DAY OF DECEMBER, 1993

415 NORTH COLLEGE STREET  
GREENVILLE, ALABAMA 36037  
(205) 382-8048

# ENGINEERING STATEMENT

IN SUPPORT A

EXHIBIT  
Figure

## COUNTERPROPOSAL MM DOCKET 93-270, RM-8323, RM-8339

**DAWSON BROADCASTING COMPANY**  
(John F. Tuck & Phonso Donaldson, Receivers)

### ALLOCATIONS STUDY

[DEPICTING THAT CHANNEL 251C3 CAN BE ALLOCATED TO LEARY  
AT OPTION I COORDINATES]

(AFTER CHANNEL 251A IS DELETED AT DAWSON & 252A DELETED AT CORDELE)

31 32 30 N. 84 19 09 W.			Class C3 Current rules spacings Channel 251 - 98.1 MHz				Search Date 12-17-93
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
<b>Community of Leary</b> Reference Coordinates: 31-29-00 84-31-00			GA	251.0	19.84		*
<b>AD251 251C3 Sasser</b> Of No Concern Channel 299C3 Allocated in lieu MM Docket 90-475			GA	311.0	3.52	153.0	-149.48 *
<b>AD251 251C3 Dawson</b> Of Concern Change to Leary, GA Proposed in Instant Counterproposal			GA	16.0	14.52	153.0	-138.48 *
<b>AD251 251A Dawson</b> Of No Concern Deletion Proposed in Instant Counterproposal			GA	324.0	26.51	142.0	-115.49 *
<b>WKKN 252A Cordele</b> Of No Concern Proposed Substitution of Channel 236A			GA	48.5	69.59	89.0	-19.41 *
<b>ALOPEN 251C1 Live Oak</b> Of No Concern Voluntary Downgrade by Form 302			FL	144.1	194.93	211.0	-16.07 *
<b>WDMT 250A Eufaula</b>			AL	297.4	94.77	89.0	5.77 *
<b>WQHLFM 251C2 Live Oak</b>			FL	137.1	189.96	177.0	12.96
<b>WISKFM 254C3 Americus</b>			GA	5.8	60.09	43.0	17.09
<b>WAGH.C 252A Fort Mitchell</b>			AL	322.8	114.44	89.0	25.44
<b>WAGH 252A Fort Mitchell</b>			AL	322.8	114.44	89.0	25.44
<b>WWSFFM 251C1 Andalusia</b>			AL	254.9	236.68	211.0	25.68
<b>WVY.C 250C3 Fort Valley</b>			GA	25.0	125.77	99.0	26.77

Ch. 251 - Class C3

**AD 251C3**

31° 32' 30"

84° 19' 09"

**LOCATION WINDOW**

SHADED AREA

N. Lat. 31 32 30

W. Lng. 84 19 09

AD251

WRLDFM

WAGH.C

WDNT

WISKFM

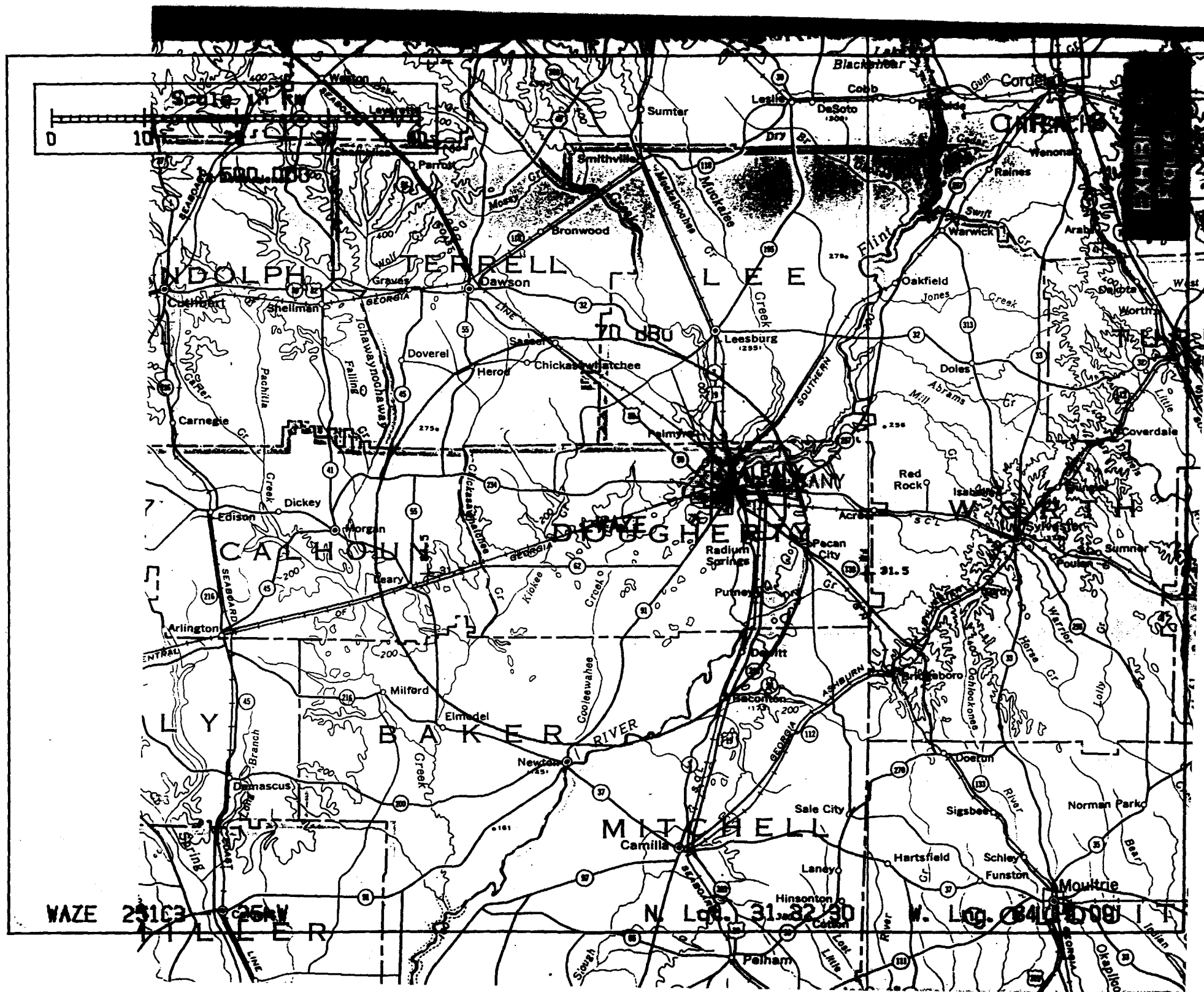
WUOVY.C

WWSFFM

WQHLFM

0 50 100

EXHIBIT  
Figure



# ENGINEERING STATEMENT

IN SUPPORT A

EXHIBIT  
Figure 1

## COUNTERPROPOSAL MM DOCKET 93-270, RM-8323, RM-8339 DAWSON BROADCASTING COMPANY

(John F. Tuck & Phonso Donaldson, Receivers)

### ALLOCATION STUDY

[DEPICTING THAT CHANNEL 251C3 CAN BE ALLOCATED TO LEARY]  
(AFTER CHANNEL 251A IS DELETED AT DAWSON)

31 23 28 N. Class C3 Search Date  
84 25 47 W. Current rules spacings 12-15-19  
Channel 251 - 98.1 MHz

Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
<b>Community of Leary</b>			GA	321.0	13.15		*
Reference Coordinates: 31-29-00 84-31-00							
<b>AD251 251C3 Sasser</b>			GA	22.4	20.56	153.0	-132.44 *
Of No Concern Channel 299C3 Allocated in lieu MM Docket 90-475							
<b>AD251 251C3 Dawson</b>			GA	25.3	33.91	153.0	-119.09 *
Of Concern Change to Leary, GA Proposed in Instant Counterproposal							
<b>AD251 251A Dawson</b>			GA	352.4	38.47	142.0	-103.53 *
Of No Concern Deletion Proposed in Instant Counterproposal							
<b>ALOPEN 251C1 Live Oak</b>			FL	138.5	188.57	211.0	-22.43 *
Of No Concern Voluntary Downgrade by Form 302							
WKKN	252A	Cordele	GA	45.0	88.70	89.0	-0.30 *
WDMT	250A	Eufaula	AL	309.2	95.24	89.0	6.24 *
WQHLFM	251C2	Live Oak	FL	131.1	186.00	177.0	9.00 *
WWSFFM	251C1	Andalusia	AL	258.4	222.75	211.0	11.75
WAGH	252A	Fort Mitchell	AL	331.4	122.82	89.0	33.82
WAGH.C	252A	Fort Mitchell	AL	331.4	122.82	89.0	33.82
WISKFM	254C3	Americus	GA	12.2	78.24	43.0	35.24
WRLDFM	251A	Valley	AL	336.1	186.14	142.0	44.14
WFSY	253C	Panama City	FL	226.1	140.63	96.0	44.63
WVY.C	250C3	Fort Valley	GA	25.9	145.35	99.0	46.35



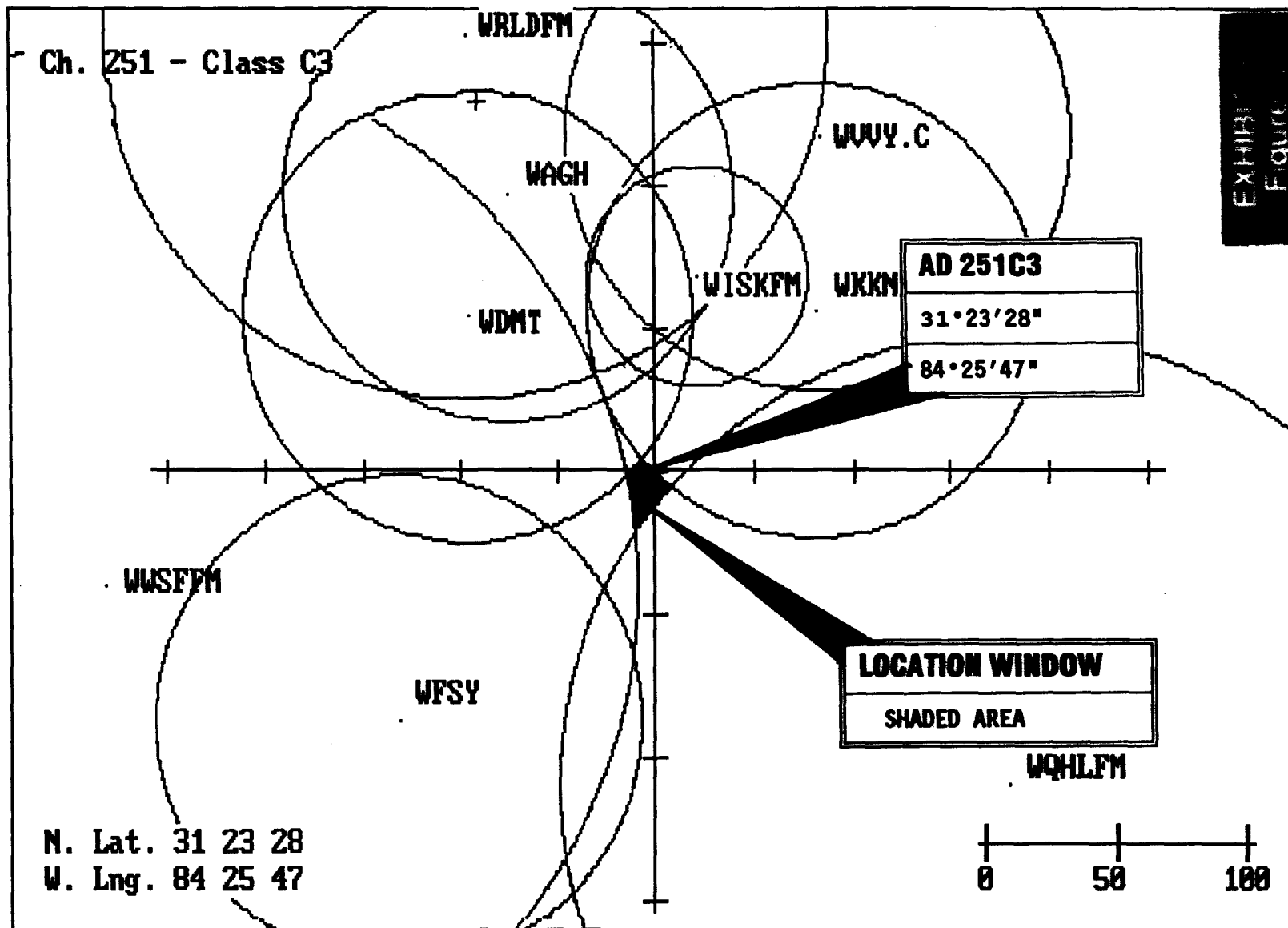


EXHIBIT  
Figure